

1 ROBERT D. SKEELS, SBN 325896  
2 rdsathene@alumni.ucla.edu  
3 132 North Westlake Avenue  
4 Los Angeles, CA 90026  
5 (213) 234-8561

6 Attorney for Petitioner and Plaintiff

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**  
10

11 ADRIAN RISKIN,  
12 Petitioner,  
13 vs.  
14 THE ACCELERATED SCHOOLS,  
15 Respondent.  
16  
17  
18  
19  
20  
21

Case No. 19STCP05135

**PETITIONER'S REPLY BRIEF;  
DECLARATION OF ADRIAN RISKIN.**

**[Gov't Code § 6250, *et seq.*; Civ. Proc.  
Code §§ 1060, 1085; Civ. Code § 3422]**

Judge: Honorable Mary H. Strobel  
Date: March 23, 2021  
Time: 09:30 A.M.  
Dept: 82

22 TO THE HON. MARY H. STROBEL, JUDGE OF THE SUPERIOR COURT:

23 Petitioner Adrian Riskin hereby submits his reply brief in support of an order  
24 compelling Respondent The Accelerated Schools to disclose public records sought in the  
25 Petition filed December 3, 2019.

26 Dated: March 8, 2021

27   
28

Robert D. Skeels, Attorney for Petitioner

1 **I. INTRODUCTION**

2 Respondent The Accelerated Schools (“TAS” or “Respondent”) has engaged in a  
3 pattern and practice, intentionally or otherwise, of falling far short of its statutory  
4 obligations under the California Public Records Act (“CPRA”). TAS partially complied  
5 with the law, as a result of the instant lawsuit, some 650 days from Adrian Riskin’s  
6 (“Petitioner”) initial records request. Exacerbating its practices of noncompliance, TAS’  
7 record production consisted of an aggregated and undifferentiated set of files, making it  
8 impossible for Petitioner to determine which files were responsive to which of his six  
9 separate public records requests—undermining one key purpose for which the requests  
10 were made.

11 Additionally, in the course of reviewing TAS’ partial production of responsive  
12 records, Petitioner discovered that Respondent had not conducted an adequate search  
13 that was reasonably calculated to locate records responsive to his requests. In possession  
14 of numerous records obtained by CPRA requests to other charter school corporations that  
15 previously complied with the law, Petitioner put Respondent on notice that their search  
16 was inadequate, and provided two example records as a courtesy to aide Respondent in  
17 doing a proper search to comply with the law.

18 **II. PREDOMINANTLY FACTUAL ISSUES**

19 **A. TAS’ claim that Vincent Shih became aware of the CPRA requests on or**  
20 **around May 1, 2019 is seemingly a misrepresentation of material fact**

21 TAS asserts that “Mr. Shih first became aware of the PRA requests from Petitioner”  
22 “On or about May 1, 2019 ”. See Respondent’s Opposition to Petition for Writ of  
23 Mandamus (“Oppo”) 7:9–12; see also Declaration of Vincent Shih (“Decl. Shih”) ¶ 7. As  
24 discussed in ¶11 of the December 3, 2019 Petition for Writ on Mandate (“12/3/19  
25 Petition”), Mr. Shih acknowledged Petitioner’s CPRA requests on February 13, 2019.  
26 Shih’s February 13, 2019 email is attached to the 12/3/19 Petition as Exhibit A. Contrary  
27 to Respondent’s assertion that TAS “formally respond[ed]” Oppo 7:4, TAS’ return  
28 communications to Petitioner failed to provide any records responsive to Petitioner’s

1 request. TAS further failed to provide a determination as to the records' disclosability or  
2 an estimated date by which those requested documents would be produced. By law,  
3 Respondent was required to provide a determination within the statutory limits:

4 "An agency has 10 days to respond to a CPRA request. One 14-day extension is  
5 permitted for specified purposes, including consultation with another agency having  
6 'substantial interest in the determination of the request.' (§ 6253, subd. (c)(3).) No  
7 further delays are authorized by the statute." *City of Los Angeles v. Metro. Water Dist. of*  
*S. California*, 42 Cal. App. 5th 290, 296, 255 Cal. Rptr. 3d 202, 209 (2019).

8 Moreover, all of TAS's overwrought explanations of why they didn't provide a  
9 determination, much less responsive records, to Petitioner during the many months  
10 following his requests (e.g. the "spam" excuse, Oppo" 7:19) should be viewed in the light  
11 that Shih was aware and acknowledged that these were CPRA requests in February 2019.

12 **B. TAS admits that it did not conduct a search for responsive records until a year**  
13 **after the first request was made, and only in response to the instant lawsuit**

14 TAS openly admits in its pleadings that it violated the CPRA by taking no action  
15 on Petitioner's requests until Petitioner litigated that matter: "After TAS was served ...  
16 TAS tasked their IT staff to search all emails, servers, laptops etc. for all key words  
17 included in Petitioner's six requests." Oppo 8:17–20. This was a year after the initial  
18 request. It would take ten more months before any records were produced.

19 Far from the "transparent gamesmanship and gambits" Oppo 8:17–20 TAS accuses  
20 him of, Petitioner patiently attempted to work with various TAS employees to obtain the  
21 responsive records without resorting to litigation. Petitioner, upon learning that  
22 Johnathan Williams may have absconded, and that Robert French may have replaced  
23 him, made efforts to forward communications regarding his CPRA requests to French,  
24 despite the statutory limits having already been exceeded by TAS. 12/3/19 Petition ¶ 30.  
25 An August 5, 2019 email from Vincent Shih to Petitioner makes no mention of the  
26 "travails and turbulence" now claimed by TAS. Exhibit DD to Riskin Declaration to  
27 Petitioner's Reply Brief ¶9 ("Riskin Rep. Dec.").

28 //

1           **C. Petitioner’s possession of responsive records that TAS should have produced**  
2 **were lawfully obtained through other CPRA requests**

3           TAS’ framing of “the fact that Petitioner obtained, without TAS’s knowledge or  
4 consent, these protected documents from another ‘collateral source,’ as Petitioner  
5 represent” seemingly implies that Petitioner engaged in some sort of wrongdoing. Quite  
6 the contrary, as described in Riskin Rep. Dec. ¶¶ 2–5, the records used to determine  
7 whether TAS had conducted an adequate search that was reasonably calculated to locate  
8 records responsive to his requests were obtained by CPRA requests to other charter  
9 school corporation that complied with the law. This sort of “cross-check[ing]” CPRA  
10 compliance by an agency through using records obtained from another agency is both  
11 common, lawful, and cited as a practice by the courts. *Golden Door Properties, LLC v.*  
12 *Superior Ct. of San Diego Cty.*, 53 Cal. App. 5th 733, 775, 267 Cal. Rptr. 3d 32, 64 (2020), as  
13 modified on denial of reh’g (Aug. 25, 2020), review denied (Nov. 10, 2020).

14           **D. TAS already supplied records it now retroactively claims are exempt**

15           TAS’s October 30, 2020 letter claimed it was withholding an unspecified number of  
16 records under blanket claims of exemptions. Skeels Declaration to Memorandum of  
17 Points and Authorities (“MPA”) in Support of Petition (“Skeels Dec.”) ¶14, Exhibit K.  
18 Petitioner then provided his attorney with the descriptions of two emails that should  
19 have been in the records production, but were not. Riskin Rep. Dec. ¶4. On November 16,  
20 2020 Petitioner’s attorney sent a letter dated November 13, 2020 to TAS sharing the  
21 descriptions of the two missing emails, and also requesting information akin to a  
22 privilege log or Vaughn Index in order to determine the validity of TAS’ exemption  
23 claims. Skeels Dec. ¶15, Exhibit K. Those two emails from which those descriptions came  
24 from were also included in the set of nineteen emails attached to Petitioner’s MPA Riskin  
25 Rep. Dec. ¶5.

26           Petitioner responded thusly in their December 10, 2020 letter:

27           We attempted to find the two emails that you use as examples in the records possessed  
28 by The Accelerated Schools. We were able to find the second email you cite (from

1 chorton@ccsa.org) and are providing it as an attachment to the email that includes this  
2 letter. There is no record that could be found with due diligence in the possession of  
3 The Accelerated Schools that is of what you describe in your first example.  
4 Skeels Dec. ¶15, Exhibit M. TAS made no claim that those two records were exempt until  
5 they filed their Opposition Brief. The email they attached to their letter is discussed as  
6 Number 8 in their brief. Oppo. 16:10. The email they claimed they couldn't locate is  
7 vigorously defended as exempt as Number 12 Oppo. 17:11.

8 Moreover, TAS was on notice of the issue of collateral records when they received  
9 the November 16, 2020 letter. Indeed, two records were provided to aide TAS in  
10 conducting a proper search. For TAS to assert they just learned of the collateral records  
11 issue on January 12, 2021 is disingenuous. Oppo. 8:23–28. They were provided an  
12 opportunity to cure their defective production and conduct an adequate search. They  
13 instead chose to challenge Petitioner to a real “game of ‘gotcha’” by demanding that  
14 Petitioner keep searching for more records to provide them, when “The burden of proof  
15 is on the proponent of nondisclosure” *California State University v. Superior Court* (2001) 90  
16 Cal.App.4th 810, 831 [108 Cal.Rptr.2d 870, 884].

17 **E. TAS already supplied records associated with and/or directly related to**  
18 **records it now retroactively claims are exempt**

19 Before even looking at the issues of law with Respondent's blanket claims for  
20 exemptions, their own production of responsive records undermines their fervent claims  
21 of said exemptions. Respondent argues at length that the emails from Keith DellAquila  
22 on April 24, 2018 and April 25, 2018 are exempt from disclosure. Numbers 5 and 6 in TAS'  
23 brief Oppo. 15:2–3. Yet TAS supplied responsive records with TAS' Bates stamps  
24 TAS32276, TAS32278, TAS32313, TAS32316, TAS32317, TAS46251, TAS46252, TAS46253,  
25 TAS46256, TAS46257, TAS46258, and TAS46259 are all part of that same email chain  
26 discussing the “Authorizing and Oversight Policy Working Group Discussion”. Exhibit  
27 AA to Riskin Rep. Dec. ¶6. Record TAS46256, for example, contains each and every  
28 element that TAS argues makes Numbers 5 and 6 exempt Oppo. 15:2–3. TAS correctly  
and legally releasing that batch of related records constitutes a waiver of the exemptions

1 for Numbers 5 and 6 under *Gov. Code* § 6254.5. More importantly, it shows that TAS is at  
2 best applying these alleged exemptions inconsistently, at worst creating ad hoc  
3 rationalizations for why it didn't disclose records that it should have.

4 Another example are the pages with TAS Bates Stamps TAS46319 and TAS46320.  
5 Exhibit BB to Riskin Rep. Dec. ¶7. It is a response by TAS' Johnathan Williams on  
6 September 19, 2018 to the email described as Numbers 8 in TAS' brief Oppo. 16:10. The  
7 Williams email contains the Cassy Horton email in its entirety. Again, TAS' correct and  
8 legally obligated disclosure of Williams email constitutes a waiver under the CPRA for  
9 the records TAS is claiming exemptions on.

10 TAS claims Numbers 10, 11, and 12 are exempt because release of those records  
11 would disclose the email addresses of members of the Los Angeles Advocacy Council  
12 ("LAAC"). Oppo. 15:8–23. TAS goes as far as to admit they could have redacted the email  
13 addresses and disclosed the records. Yet TAS' document production included a record  
14 with TAS Bates Stamp TAS33668 that discloses the list of LAAC members and their email  
15 addresses. Exhibit CC to Riskin Rep. Dec. ¶8. TAS' correct and legally obligated  
16 disclosure of the record constitutes a waiver under the CPRA for the records TAS is  
17 claiming exempt.

18 **F. TAS has provided gravely conflicting accounts of how many records it has**  
19 **exempted**

20 TAS' December 10, 2020 letter states "[a]s required, we provided your client with  
21 the legal authority for why a very small percentage of records were not provided to him."  
22 Skeels Dec. ¶15, Exhibit M. Yet TAS says in their brief that their 2020 search for  
23 responsive records requested in 2019 "resulted in hundreds of thousands of records."  
24 Oppo. 8:20. While both parties have referred to 55,000 records produced, that figure  
25 really describes pages. Petitioner notes that the number of individual files provided was  
26 9,453, which is likely more indicative of the actual number of responsive records  
27 produced. Riskin Rep. Dec. ¶10. The disparity between the number of records TAS  
28 provided, and the two wildly different figures provided for exemptions illustrates why

1 their search was inadequate, and that TAS' refusal to provide a privilege log or Vaughn  
2 Index has complicated this matter.

### 3 **III. PREDOMINANTLY LEGAL ISSUES**

#### 4 **A. Petitioners's purpose for requesting responsive records under the CPRA is** 5 **immaterial and may not be used by TAS to deny disclosure**

6 On or around February 27, 2021, Petitioner filed an objection to Exhibit G to the  
7 accompanying Declaration of Jeffrey L. Anderson with this court on the grounds that the  
8 contents of the exhibit are both irrelevant and unduly prejudicial. While it is Petitioner's  
9 hope that his objection will be sustained and Exhibit G will be stricken in its entirety,  
10 there's still the issue of TAS berating, impugning, and questioning the motives of  
11 Petitioner throughout their brief (e.g. "Petitioner's historical access of public records from  
12 charter schools is typically used to defame and cynically make fun of educators" Oppo.  
13 13:7-9; "use these emails to make fun of charter schools or to create some type of false  
14 narrative." Oppo. 15:13-14; "Petitioner engages in cruel and meanspirited personal  
15 attacks" Oppo. 6:3-4.).

16 Petitioner places the information disclosed by CPRA requests on his blog in order  
17 to provide scholars, journalists, activists, and community members with critical  
18 information about the inner workings of privately managed, but publicly funded, charter  
19 school corporations. However, Petitioner could use the disclosures "for any purpose".  
20 *City of Los Angeles v. Superior Court (Axelrad)*, 82 Cal. App. 4th 819, 825, 98 Cal. Rptr. 2d  
21 564 (2000). Indeed, the CPRA "does not allow limitations on access to a public record  
22 based upon the purpose for which the record is being requested, if the record is otherwise  
23 subject to disclosure." *Gov. Code* § 6257.5. Ultimately "the purpose of the requesting party  
24 in seeking disclosure cannot be considered..." *California State University v. Superior Court*  
25 (2001) 90 Cal.App.4th 810, 831 [108 Cal.Rptr.2d 870, 884]. All of Respondent's arguments  
26 depending on attacking Petitioner's purpose for making the requests should be treated  
27 accordingly.

28 //

1           **B. Public interest is extremely high in disclosure**

2           TAS seems conflicted as to whether public interest in disclosure is low or high. On  
3 the one hand, TAS asserts that Respondent is trying to “persuade this Court to  
4 overestimate the public interest” Oppo. 13:11. On the other hand, TAS speaks of the  
5 importance of “Assembly Bill 1505 (‘AB 1505’),” a bill that was intended to provide a  
6 modicum of badly needed oversight and accountability measures to the charter school  
7 industry. While TAS paints such issues as only in the interest of charter school executives,  
8 the truth is “[w]hat charter schools do with the public money that they receive is a matter  
9 of legitimate concern to the taxpaying public.” (101 Ops.Cal.Atty.Gen. 92, at 9).

10           Indeed, “corporate charter schools—which bear attributes of both public and  
11 private enterprises” (101 Ops.Cal.Atty.Gen. 92, at 6) have long resisted efforts to make  
12 them more transparent and accountable to the public from which they draw their  
13 funding. Corporate charters schools, and their aggressive trade association, the California  
14 Charter Schools Association (“CCSA”), vehemently opposed application of the Brown  
15 Act, CPRA, and conflicts of interest laws to charter school corporations. Likewise, as  
16 Respondent admits in their pleadings, they opposed AB 1505. Oppo. 12:20.

17           “...access to information concerning the conduct of the people’s business is a  
18 fundamental and necessary right of every person in this state.” *Gov. Code 6250*.  
19 Petitioner’s blog, as explained in Petitioner’s MPA III.C, in addition to information  
20 uncovered being featured in the *Los Angeles Times* and other publications, is often cited by  
21 Former U.S. Assistant Secretary of Education and current New York University Professor  
22 Diane Ravitch. Riskin Rep. Dec. ¶11.

23           **C. Petitioner is contesting more than the 19 records obtained from collateral**  
24 **sources**

25           TAS inexplicably seems to believe that Petitioner is only interested in the 19  
26 records he provided as examples of how they did not conduct adequate search that was  
27 reasonably calculated to locate records responsive to his requests. *City of San Jose v.*  
28 *Superior Court* (2017) 2 Cal. 5th 608, 627. This is not true. Petitioner is requesting that TAS



1 cure the aggregation of the records in order to identify if the records to be responsive to  
2 his requests; he is requesting a new search if necessary, he is requesting disclosure of  
3 nonexempt documents, and he is requesting a privilege log or Vaughn Index in regards  
4 to records being claimed exempt.

5 Petitioner has already shown in II.D. and II.E. supra that TAS is withholding  
6 records that it has already waived and those records must be provided. The burden is not  
7 on Petitioner to keep providing TAS with additional records for TAS to determine if they  
8 feel like disclosing them. *Citizens for a Better Environment v. Dept. of Food & Agriculture*  
9 (1985) 171 Cal. App. 3d 704, 711.

10 **D. Labor & Workforce Dev. Agency v. Superior Court is easily distinguishable**  
11 **from this case**

12 TAS relies heavily on *Labor & Workforce Dev. Agency v. Superior Court*, 19 Cal. App.  
13 5th 12, 227 Cal. Rptr. 3d 744 (2018)c to justify their blanket exemptions claimed under  
14 deliberative process. Oppo. 10–11; 14:24–27; 17:15; However, unlike that case TAS has not  
15 “solicited input from ‘stakeholders’ on a ‘confidential basis.’ *Labor & Workforce Dev.*  
16 *Agency v. Superior Court*, 19 Cal. App. 5th 12 at 30. Instead, nearly all of the emails in  
17 contention, both those TAS claims are exempt, and the corresponding documents  
18 discussed in II.D. and II.E. supra that TAS provided, were initiated by the CCSA trade  
19 association. TAS admits in its pleadings that CCSA is a “private agency”. Oppo. 17–20.  
20 CCSA serves a role much like the US Chamber of Commerce in that it provides support  
21 for its members, engages in lobbying to increase corporate charter school market share,  
22 engages in statewide lobbying on behalf of the charter school industry, and even sells  
23 products and services to its members.<sup>1</sup>

24 Respondent has not shown that TAS was in a role like the California Labor and  
25 Workforce Development Agency, which was tasked with crafting legislation and made  
26 confidential requests from other agencies and entities in the predecisional phases of its  
27

28 <sup>1</sup> <https://info.ccsa.org/vendor-directory>

1 work. Instead, TAS has shown that the bulk of the records it is withholding are  
2 invitations to meetings, notices of meeting cancellation, etc., originating from the CCSA.  
3 The communications were neither predecisional, nor confidential. Petitioner has these  
4 records, as discussed in II.C. supra, because other charter school corporations on the  
5 same mailing list complied with the CPRA and provided the responsive records.

#### 6 **E. Blanket exemptions are not allowed**

7 While TAS does address emails (several of which are waived) individually, or in  
8 small batches in their brief, their post hoc rationalizations for non-disclosure look exactly  
9 like the boilerplate language discussed in *Golden Door Properties, LLC v. Superior Ct. of San*  
10 *Diego Cty.*, 53 Cal. App. 5th 733, 790, 267 Cal. Rptr. 3d 32, 76 (2020), as modified on denial  
11 of reh'g (Aug. 25, 2020), review denied (Nov. 10, 2020)[“conclusory or boilerplate  
12 assertions that merely recite the statutory standards”]. There, the court quoted the  
13 exemption claims by the respondent that fit the description of boilerplate and said the  
14 exemption claims were insufficient:

15 “County staff must be able to have candid conversations and a free-exchange of ideas  
16 with consultants retained to prepare project environmental documents .... [¶] ... [¶]

17 “The candid exchange of ideas through this process ensures the preparation of a more  
18 robust, informational, and objective EIR for public review. [¶] ... [¶]

19 “[If] required to publicize deliberations between County staff and outside qualified  
20 environmental consultants, the County would be forced to re-examine its current  
21 policies concerning deliberation and preparation of environmental documents for  
22 projects under CEQA. [¶] ... [¶]

23 [ ... ]

24 “There is also a strong public policy interest in avoiding the confusion likely to result if  
25 different initial draft versions of the same EIR document, such as the Project EIR, are  
26 released.” *Golden Door Properties, LLC v. Superior Ct. of San Diego Cty.*, 53 Cal. App. 5th  
27 733, 791, 267 Cal. Rptr. 3d 32, 76–77 (2020), as modified on denial of reh'g (Aug. 25,  
28 2020), review denied (Nov. 10, 2020)

Compare TAS’ boilerplate exemption language discussed in their brief:

“expose the decision-making process in such a way as to discourage candid  
discussion with the agencies involved thereby undermining all charter schools”

1 Oppo. 14:24–26

2  
3 “disclosure of such communications allows for the frank and candid discussion  
4 between charter schools and their statewide political advocacy agent on these  
5 important political issues.” Oppo. 15:8–9

6  
7 “The public interest in disclosure of draft versions of or comments about this  
8 document is minimal” Oppo. 16:5–6

9  
10 These rationalizations are insufficient. TAS has not met its burden to justify  
11 nondisclosure. *California State University v. Superior Court* (2001) 90 Cal.App.4th 810, 831  
12 [108 Cal.Rptr.2d 870, 884]. If the California legislature wanted to grant a blanket  
13 exemption for all communications between the CCSA and its corporate charter school  
14 members, they would have codified it in Ed. Code § 47604.1(b)(2)(A). Instead, TAS is  
15 subject to the CPRA and must disclose nonexempt responsive records.

16 **IV. CONCLUSION**

17 For the foregoing reasons, Petitioner respectfully requests that the Court grant the  
18 Petition.

19  
20 DATED: March 8, 2021

21  
22 Respectfully Submitted,

23  
24 

25 Robert D. Skeels

26 Attorney for Petitioner and Plaintiff  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8

I, ADRIAN RISKIN, declare:

1. I am the Petitioner and Plaintiff in this action.
2. I have made a number of CPRA requests from other charter school corporations in Los Angeles County. Many of them comply with the law and provide responsive records without litigation or the threat of litigation. Through that process, I have obtained many emails that feature the California Charter Schools Association (“CCSA”) as either a sender or recipient. Those emails are frequently between the CCSA and a group of its constituent charter school corporations. A good number of those emails include The Accelerated Schools (“TAS”) as either a recipient or sender.
3. On November 1, 2020 I did a thorough search in the records provided by TAS on October 30, 2020 for a subset of records discussed in ¶2. I was unable to locate the corresponding, responsive records in TAS’ production of records.
4. On or around November 1, 2020 I provided my attorney with descriptions of two of those emails to provide TAS to aide in them conducting a proper search. They were “An email from lfigueroa@ccsa.org to jwilliams@accelerated.org (and others) on March 6, 2019 at 12:36 PM with subject: <Review Req’d> LAAC March Meeting Agenda & Materials” and “An email from chorton@ccsa.org to jwilliams@accelerated.org (and others) on September 19, 2018 at 10:09 AM with subject: <For Feedback/ Approval by 7pm Today> LAAC Collective Renewal Criteria Letter”. My attorney included them in a letter he sent to TAS on November 16, 2020.
5. In preparation of the Memorandum of Points and Authorities in support of this petition. I provided my attorney true and correct copies of 19 such emails as examples of records I possess from prior CPRA requests to other charter school corporations discussed in ¶2. Those emails, and many others, should have been present in the responsive records provided by TAS on October 30, 2020. Those example emails were attached as *Exhibit A* to my Memorandum of Points and Authorities in support in of the writ.

1. I am the Petitioner and Plaintiff in this action.

2. I have made a number of CPRA requests from other charter school

corporations in Los Angeles County. Many of them comply with the law and provide responsive records without litigation or the threat of litigation. Through that process, I have obtained many emails that feature the California Charter Schools Association (“CCSA”) as either a sender or recipient. Those emails are frequently between the CCSA and a group of its constituent charter school corporations. A good number of those emails include The Accelerated Schools (“TAS”) as either a recipient or sender.

3. On November 1, 2020 I did a thorough search in the records provided by TAS on October 30, 2020 for a subset of records discussed in ¶2. I was unable to locate the corresponding, responsive records in TAS' production of records.

4. On or around November 1, 2020 I provided my attorney with descriptions of two of those emails to provide TAS to aide in them conducting a proper search. They were “An email from lfigueroa@ccsa.org to jwilliams@accelerated.org (and others) on March 6, 2019 at 12:36 PM with subject: <Review Req'd> LAAC March Meeting Agenda & Materials” and “An email from chorton@ccsa.org to jwilliams@accelerated.org (and others) on September 19, 2018 at 10:09 AM with subject: <For Feedback/ Approval by 7pm Today> LAAC Collective Renewal Criteria Letter”. My attorney included them in a letter he sent to TAS on November 16, 2020.

5. In preparation of the Memorandum of Points and Authorities in support of this petition. I provided my attorney true and correct copies of 19 such emails as examples of records I possess from prior CPRA requests to other charter school corporations discussed in ¶2. Those emails, and many others, should have been present in the responsive records provided by TAS on October 30, 2020. Those example emails were attached as *Exhibit A* to my Memorandum of Points and Authorities in support in of the writ.

1           6.       Attached as *Exhibit AA* are true and correct copies of records provided by  
2 TAS on October 30, 2020. They are TAS Bates stamped TAS32276, TAS32278, TAS32313,  
3 TAS32316, TAS32317, TAS46251, TAS46252, TAS46253, TAS46256, TAS46257, TAS46258,  
4 and TAS46259.

5           7.       Attached as *Exhibit BB* are true and correct copies of records provided by  
6 TAS on October 30, 2020. They are TAS Bates stamped TAS46319 and TAS46320.

7           8.       Attached as *Exhibit CC* is a true and correct copy of a record provided by  
8 TAS on October 30, 2020. It is TAS Bates stamped TAS33668.

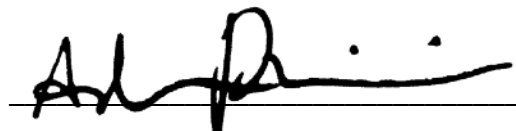
9           9.       Attached as *Exhibit DD* is a true and correct copy of an email from Vincent  
10 Shih dated August 5, 2019.

11          10.       TAS uses "pages" and "records" interchangeably in their brief. They  
12 produced 9452 files in their NativeFiles archive and 9453 in their PDF Bates Stamped  
13 archive. The discussion of 55,000 must be pages, but emails don't have an intrinsic  
14 number of pages. Pagination is imposed on them by the export method and/or the client  
15 used. Also, many of the emails are replies in chains which reproduce previous emails  
16 repeatedly.

17          11.       My website is frequently cited and linked to by former U.S. Assistant  
18 Secretary of Education and current New York University Professor Diane Ravitch on her  
19 blog, where she disseminates information about charter schools nationally. There are  
20 currently more than a dozen such posts on Professor Ravitch's blog. [https://](https://dianeravitch.net/?s=michaelkohlhaas.org)  
21 [dianeravitch.net/?s=michaelkohlhaas.org](https://dianeravitch.net/?s=michaelkohlhaas.org)

22           I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct.

24           Executed on this the 8th day of March, 2021 in Los Angeles, California.

25  
26  
27  
28  


Adrian Riskin

Exhibit AA

**Subject:** Unified Authorizing and Oversight Policy Working Group Meeting  
**Location:** CCSA LA Office 250 E. 1st Street, Suite 1000, Los Angeles, CA 90015

**Start:** Friday, March 23, 2018 7:30 AM PDT  
**End:** Friday, March 23, 2018 9:00 AM PDT  
**Show Time As:** Busy

**Recurrence:** None

**Meeting Status:** Not yet responded

**Required Attendees:** Oliver Sicat <osicat@ednovate.org>; agoldring@laleadership.org <agoldring@laleadership.org>; ellavan@laalliance.org <ellavan@laalliance.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Annabelle Eliashiv <annabelle.eliashiv@greendot.org>; Ana Ponce <aponce@caminonuevo.org>; ykingberg@ypics.org <ykingberg@ypics.org>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; Elena Paul <E.Paul@birminghamcharter.com>; Liza Bercovici <liza@gabri.org>; Emilio Pack <epack@stem-prep.org>; C DeJesus <cdejesus@greendot.org>; D Katzir <dkatzir@laalliance.org>; P Hudnut <phudnut@icefps.org>; Johnathan Williams <jwilliams@accelerated.org>; Marcia Aaron <maaron@kippla.org>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Carrie Wagner <cwagner@galsla.org>; gscotti@polahs.net <gscotti@polahs.net>; Lopez, Cesar <clopez@apexacademyhs.info>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Zainab Ali <zali@laalliance.org>

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

**Subject:** Unified Authorizing and Oversight Policy Working Group Meeting  
**Location:** CCSA LA Office 250 E. 1st Street, Suite 1000, Los Angeles, CA 90015

**Start:** Friday, March 23, 2018 7:30 AM PDT  
**End:** Friday, March 23, 2018 9:00 AM PDT  
**Show Time As:** Busy

**Recurrence:** None

**Meeting Status:** Not yet responded

**Required Attendees:** D Katzir <dkatzir@laalliance.org>; Johnathan Williams <jwilliams@accelerated.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; Marcia Aaron <maaron@kippla.org>; agoldring@laleadership.org <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Oliver Sicat <osicat@ednovate.org>; Elena Paul <E.Paul@birminghamcharter.com>; gscotti@polahs.net <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashev@greendot.org>

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.



**From:** Keith Dell'Aquila <KDellAquila@ccsa.org>

**Sent:** Wednesday, April 18, 2018 5:44 PM PDT

**To:** Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; agoldring@laleadership.org <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; gscotti@polahs.net <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashev@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicut <osicut@ednovate.org>; Ana Ponce <Ana.Ponce@CaminoNuevo.org>; Richard Thomas <rthomas@nhcharteracademy.com>; Elizabeth Saiger <esaiger@ednovate.org>

**Subject:** <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting

Hi, Authorizing and Oversight Policy Working Group Members,

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. **Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week:**

- **Wednesday, 4/25: 2:30-4:00pm**
- **Thursday, 4/26: 2:30-4:00pm**

We know how much is on your plates right now and how much CCSA has asked of you, so we're committed to only making asks of you when it's critical. So far, we've achieved major wins on the Applicable Policies, secured improved, universal DRL for all schools, and cleared a path to addressing critical holes in charter renewal framework. We also have a commitment from District leadership to continue our collaboration as a working group. At the same time, some of you have received take the opportunity to provide collective feedback on the District's Discipline Foundation Policy, which the CSD framed as continuing the collaborative spirit of this group.

This presents us with another opportunity to speak with a collective voice, not simply with one-off responses, and to tackle these challenges together in a way that makes sense for all of us. With change the only constant at LAUSD, we're committed to making sure we move this work on authorization, renewals, and oversight forward with your leadership and collective voice.

We will circulate a formal agenda and any relevant materials in advance of the discussion. Please reach out to me and Jennie with ideas or questions while Cassy enjoys a well-deserved mini-vacation the rest of this week.

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

**From:** Keith Dell'Aquila <KDellAquila@ccsa.org>

**Sent:** Friday, April 20, 2018 3:59 PM PDT

**To:** Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; agoldring@laleadership.org <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; gscotti@polahs.net <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashiv@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicat <osicat@ednovate.org>; Ana Ponce <Ana.Ponce@CaminoNuevo.org>; Richard Thomas <rthomas@nhcharteracademy.com>; Elizabeth Saiger <esaiger@ednovate.org>

**Subject:** Re: <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting

We'll move ahead with Wednesday, April 25 from 2:30-4pm at CCSA Offices in DTLA. A calendar invite is forthcoming, and a formal agenda will be shared beforehand.

For those of you unable to be present, we'll follow up individually to ensure your feedback is captured and shared before our next conversation with District staff.

Thank you, all, for your continued advocacy on behalf of our community and kids,

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

Your vote matters! The 2018 statewide primary election will have a big impact on the future of California's public schools and students. Help ensure we elect candidates who support charter public schools and will put kids first. The deadline to register to vote is May 21. Be sure to [register to vote](#) and make your voice heard on June 5!

---

**From:** Keith Dell'Aquila <KDellAquila@ccsa.org>

**Date:** Wednesday, April 18, 2018 at 5:44 PM

**To:** Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; "lbrianza@kippla.org" <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; "ellavan@laalliance.org" <ellavan@laalliance.org>; Arina Goldring <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>; "ykingberg@ypics.org" <ykingberg@ypics.org>; Parker Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; "Lopez, Cesar" <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; "gscotti@polahs.net" <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashiv@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicat <osicat@ednovate.org>; Ana Ponce <Ana.Ponce@CaminoNuevo.org>; Richard Thomas <rthomas@nhcharteracademy.com>; Elizabeth Saiger <esaiger@ednovate.org>

**Subject:** <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting

Hi, Authorizing and Oversight Policy Working Group Members,

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. **Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week:**

- **Wednesday, 4/25: 2:30-4:00pm**
- **Thursday, 4/26: 2:30-4:00pm**

We know how much is on your plates right now and how much CCSA has asked of you, so we're committed to only making asks of you when it's critical. So far, we've achieved major wins on the Applicable Policies, secured improved, universal DRL for all schools, and cleared a path to addressing critical holes in charter renewal framework. We also have a commitment from District leadership to continue our collaboration as a working group. At the same time, some of you have received take the opportunity to provide collective feedback on the District's Discipline Foundation Policy, which the CSD framed as continuing the collaborative spirit of this group.

This presents us with another opportunity to speak with a collective voice, not simply with one-off responses, and to tackle these challenges together in a way that makes sense for all of us. With change the only constant at LAUSD, we're committed to making sure we move this work on authorization, renewals, and oversight forward with your leadership and collective voice.

We will circulate a formal agenda and any relevant materials in advance of the discussion. Please reach out to me and Jennie with ideas or questions while Cassy enjoys a well-deserved mini-vacation the rest of this week.

Keith Dell'Aquila  
Director, Regional Advocacy, Greater Los Angeles  
213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

**From:** Richard Thomas <rthomas@nhcharteracademy.com>  
**Sent:** Wednesday, April 18, 2018 7:59 PM PDT  
**To:** Keith Dell'Aquila <KDellAquila@ccsa.org>  
**CC:** Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; agoldring@laleadership.org <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; gscotti@polahs.net <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashev@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicat <osicat@ednovate.org>; Ana Ponce <Ana.Ponce@CaminoNuevo.org>; Elizabeth Saiger <esaiger@ednovate.org>  
**Subject:** Re: <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting

April 26th works for me. Thank you.

Richard

Richard Thomas, M. Ed.  
Executive Director  
New Horizons Charter Academy  
[rthomas@nhcharteracademy.com](mailto:rthomas@nhcharteracademy.com)  
818-655-9602

On Apr 18, 2018, at 5:44 PM, Keith Dell'Aquila <[KDellAquila@ccsa.org](mailto:KDellAquila@ccsa.org)> wrote:

Hi, Authorizing and Oversight Policy Working Group Members,

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. **Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week:**

- **Wednesday, 4/25: 2:30-4:00pm**
- **Thursday, 4/26: 2:30-4:00pm**

We know how much is on your plates right now and how much CCSA has asked of you, so we're committed to only making asks of you when it's critical. So far, we've achieved major wins on the Applicable Policies, secured improved, universal DRL for all schools, and cleared a path to addressing critical holes in charter renewal framework. We also have a commitment from District leadership to continue our collaboration as a working group. At the same time, some of you have received take the opportunity to provide collective feedback on the District's Discipline Foundation Policy, which the CSD framed as continuing the collaborative spirit of this group.

This presents us with another opportunity to speak with a collective voice, not simply with one-off responses, and to tackle these challenges together in a way that makes sense for all of us. With change the only constant at LAUSD, we're committed to making sure we move this work on authorization, renewals, and oversight forward with your leadership and collective voice.

We will circulate a formal agenda and any relevant materials in advance of the discussion. Please reach out to me and Jennie with ideas or questions while Cassy enjoys a well-deserved mini-vacation the rest of this week.

Keith Dell'Aquila  
Director, Regional Advocacy, Greater Los Angeles  
213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

**From:** agoldring@laleadership.org <agoldring@laleadership.org>  
**Sent:** Wednesday, April 18, 2018 8:36 PM PDT  
**To:** Richard Thomas <rthomas@nhcharteracademy.com>  
**CC:** Keith Dell'Aquila <KDellAquila@ccsa.org>; Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; Ibrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; gscotti@polahs.net <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashev@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicat <osicat@ednovate.org>; Ana Ponce <Ana.Ponce@CaminoNuevo.org>; Elizabeth Saiger <esaiger@ednovate.org>  
**Subject:** Re: <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting  
April 25th works for me.

Sent from my iPhone

On Apr 18, 2018, at 7:59 PM, Richard Thomas <[rthomas@nhcharteracademy.com](mailto:rthomas@nhcharteracademy.com)> wrote:

April 26th works for me. Thank you.

Richard

Richard Thomas, M. Ed.  
Executive Director  
New Horizons Charter Academy  
[rthomas@nhcharteracademy.com](mailto:rthomas@nhcharteracademy.com)  
818-655-9602

On Apr 18, 2018, at 5:44 PM, Keith Dell'Aquila <[KDellAquila@ccsa.org](mailto:KDellAquila@ccsa.org)> wrote:

Hi, Authorizing and Oversight Policy Working Group Members,

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. **Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week:**

- **Wednesday, 4/25: 2:30-4:00pm**
- **Thursday, 4/26: 2:30-4:00pm**

We know how much is on your plates right now and how much CCSA has asked of you, so we're committed to only making asks of you when it's critical. So far, we've achieved major wins on the Applicable Policies, secured improved, universal DRL for all schools, and cleared a path to addressing critical holes in charter renewal framework. We also have a commitment from District leadership to continue our collaboration as a working group. At the same time, some of you have received take the opportunity to provide collective feedback on the District's Discipline Foundation Policy, which the CSD framed as continuing the collaborative spirit of this group.

This presents us with another opportunity to speak with a collective voice, not simply with one-off responses, and to tackle these challenges together in a way that makes sense for all of us. With change the only constant at LAUSD, we're committed to making sure we move this work on authorization, renewals, and oversight forward with your leadership and collective voice.

We will circulate a formal agenda and any relevant materials in advance of the discussion. Please reach out to me and Jennie with ideas or questions while Cassy enjoys a well-deserved mini-vacation the rest of this week.

Keith Dell'Aquila  
Director, Regional Advocacy, Greater Los Angeles  
213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the

addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

**From:** Gaetano Scotti <gscotti@polahs.net>  
**Sent:** Friday, April 20, 2018 1:20 PM PDT  
**To:** Keith Dell'Aquila <KDellAquila@ccsa.org>  
**CC:** Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; agoldring@laleadership.org <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashev@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicat <osicat@ednovate.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; Richard Thomas <rthomas@nhcharteracademy.com>; Elizabeth Saiger <esaiger@ednovate.org>  
**Subject:** Re: <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting  
4/25 is my preference

Tom  
POLAHS

On Wed, Apr 18, 2018 at 5:44 PM, Keith Dell'Aquila<[KDellAquila@ccsa.org](mailto:KDellAquila@ccsa.org)> wrote:

Hi, Authorizing and Oversight Policy Working Group Members,

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. **Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week:**

- **Wednesday, 4/25: 2:30-4:00pm**
- **Thursday, 4/26: 2:30-4:00pm**

We know how much is on your plates right now and how much CCSA has asked of you, so we're committed to only making asks of you when it's critical. So far, we've achieved major wins on the Applicable Policies, secured improved, universal DRL for all schools, and cleared a path to addressing critical holes in charter renewal framework. We also have a commitment from District leadership to continue our collaboration as a working group. At the same time, some of you have received take the opportunity to provide collective feedback on the District's Discipline Foundation Policy, which the CSD framed as continuing the collaborative spirit of this group.

This presents us with another opportunity to speak with a collective voice, not simply with one-off responses, and to tackle these challenges together in a way that makes sense for all of us. With change the only constant at LAUSD, we're committed to making sure we move this work on authorization, renewals, and oversight forward with your leadership and collective voice.

We will circulate a formal agenda and any relevant materials in advance of the discussion. Please reach out to me and Jennie with ideas or questions while Cassy enjoys a well-deserved mini-vacation the rest of this week.

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.



**From:** Richard Thomas <rthomas@nhcharteracademy.com>

**Sent:** Friday, April 20, 2018 1:57 PM PDT

**To:** Keith Dell'Aquila <KDellAquila@ccsa.org>

**CC:** Cassy Horton <chorton@ccsa.org>; Johnathan Williams <jwilliams@accelerated.org>; lbrianza@kippla.org <lbrianza@kippla.org>; Emilio Pack <epack@stem-prep.org>; ellavan@laalliance.org <ellavan@laalliance.org>; agoldring@laleadership.org <agoldring@laleadership.org>; Carrie Wagner <cwagner@galsla.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; ykingberg@ypics.org <ykingberg@ypics.org>; P Hudnut <phudnut@icefps.org>; Zainab Ali <zali@laalliance.org>; Lopez, Cesar <clopez@apexacademyhs.info>; Rhonda Deomampo <rdeomampo@wearesynergy.org>; Hrag Hamalian <hhamalian@brightstarschools.org>; Ana Ponce <aponce@caminonuevo.org>; Elena Paul <E.Paul@birminghamcharter.com>; gscotti@polahs.net <gscotti@polahs.net>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Liza Bercovici <liza@gabri.org>; Annabelle Eliashiv <annabelle.eliashiv@greendot.org>; Jennie Shin <jshin@ccsa.org>; D Katzir <dkatzir@laalliance.org>; Marcia Aaron <maaron@kippla.org>; C DeJesus <cdejesus@greendot.org>; Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>; Oliver Sicat <osicat@ednovate.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; Elizabeth Saiger <esaiger@ednovate.org>

**Subject:** Re: <Quick Response Requested> Unified Authorizing and Oversight Policy Working Group Meeting

Hello Keith,

If the consensus is April 25th, I can make it by 3pm. Thank you.

Richard

On Wed, Apr 18, 2018 at 5:44 PM, Keith Dell'Aquila<[KDellAquila@ccsa.org](mailto:KDellAquila@ccsa.org)> wrote:

Hi, Authorizing and Oversight Policy Working Group Members,

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. **Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week:**

- **Wednesday, 4/25: 2:30-4:00pm**
- **Thursday, 4/26: 2:30-4:00pm**

We know how much is on your plates right now and how much CCSA has asked of you, so we're committed to only making asks of you when it's critical. So far, we've achieved major wins on the Applicable Policies, secured improved, universal DRL for all schools, and cleared a path to addressing critical holes in charter renewal framework. We also have a commitment from District leadership to continue our collaboration as a working group. At the same time, some of you have received take the opportunity to provide collective feedback on the District's Discipline Foundation Policy, which the CSD framed as continuing the collaborative spirit of this group.

This presents us with another opportunity to speak with a collective voice, not simply with one-off responses, and to tackle these challenges together in a way that makes sense for all of us. With change the only constant at LAUSD, we're committed to making sure we move this work on authorization, renewals, and oversight forward with your leadership and collective voice.

We will circulate a formal agenda and any relevant materials in advance of the discussion. Please reach out to me and Jennie with ideas or questions while Cassy enjoys a well-deserved mini-vacation the rest of this week.

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | [kdellaquila@ccsa.org](mailto:kdellaquila@ccsa.org)

--  
Richard Thomas, M.Ed.  
Executive Director  
New Horizons Charter Academy,  
5955 Lankershim Blvd.,  
North Hollywood, CA 91601

Phone:(818) 655-9602  
Fax: (818) 769-2346

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Exhibit BB

**From:** Johnathan Williams <jwilliams@accelerated.org>  
**Sent:** Wednesday, September 19, 2018 7:19 PM PDT  
**To:** Cassy Horton <chorton@ccsa.org>  
**CC:** Keith Dell'Aquila <KDellAquila@ccsa.org>  
**Subject:** Re: <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter  
yes!

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Cassy Horton <chorton@ccsa.org>  
Date: 9/19/18 6:35 PM (GMT-08:00)  
To: Johnathan Williams <jwilliams@accelerated.org>  
Cc: Keith Dell'Aquila <KDellAquila@ccsa.org>  
Subject: FW: <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter

Hi Johnathan,

Can you please let us know if you have any concerns with the attached letter by no 10am tomorrow? We plan to include all LAAC as signatories after we incorporate any feedback we receive. If you need more time to review please let me know; otherwise we will count you in.

Thank you!

Cassy Horton  
Managing Director, Regional Advocacy, Greater Los Angeles  
California Charter Schools Association  
Cell: 213-926-7763  
Email: [chorton@ccsa.org](mailto:chorton@ccsa.org)



Registration for the 26th Annual California Charter Schools Conference is open! [Register today and save!](#) The conference will be held March 11-14, 2019 at the Sacramento Convention Center. We look forward to seeing you there!

---

**From:** Cassy Horton  
**Sent:** Wednesday, September 19, 2018 10:10 AM  
**To:** Ana Ponce <[aponce@caminonuevo.org](mailto:aponce@caminonuevo.org)>; 'Cristina de Jesus' <[cdejesus@greendot.org](mailto:cdejesus@greendot.org)>; 'Emilio Pack' <[epack@stem-prep.org](mailto:epack@stem-prep.org)>; 'Marcia Aaron' <[maaron@kippla.org](mailto:maaron@kippla.org)>; bbauer <[bbauer@ghchs.com](mailto:bbauer@ghchs.com)>; 'erin.studer@chimeinstitute.org' <[erin.studer@chimeinstitute.org](mailto:erin.studer@chimeinstitute.org)>; 'Valerie Braimah' <[vbraimah@citycharterschools.org](mailto:vbraimah@citycharterschools.org)>; 'Oliver Sicut' <[osicat@ednovate.org](mailto:osicat@ednovate.org)>; 'Pamela Magee' <[pmagee@palihigh.org](mailto:pmagee@palihigh.org)>; 'Parker Hudnut' <[PHudnut@icefps.org](mailto:PHudnut@icefps.org)>; 'emorris@endeavorcollegeprep.org' <[emorris@endeavorcollegeprep.org](mailto:emorris@endeavorcollegeprep.org)>; 'Vanessa Jackson' <[vanessajackson@collegiatecharterhighschool.org](mailto:vanessajackson@collegiatecharterhighschool.org)>; 'Yvette Kingberg' <[Ykingberg@yahoo.com](mailto:Ykingberg@yahoo.com)>; 'Mark Kleger-Heine' <[mkleger-heine@cwcloseangeles.org](mailto:mkleger-heine@cwcloseangeles.org)>; 'cwagner@galschoolsla.org' <[cwagner@galschoolsla.org](mailto:cwagner@galschoolsla.org)>; 'agoldring@laleadership.org' <[agoldring@laleadership.org](mailto:agoldring@laleadership.org)>; 'nbarriga@resoluteacademy.org' <[nbarriga@resoluteacademy.org](mailto:nbarriga@resoluteacademy.org)>; Johnathan Williams <[jwilliams@accelerated.org](mailto:jwilliams@accelerated.org)>; 'NHCA' <[rthomas@nhcharteracademy.com](mailto:rthomas@nhcharteracademy.com)>  
**Cc:** Keith Dell'Aquila (<[KDellAquila@ccsa.org](mailto:KDellAquila@ccsa.org)>) <[KDellAquila@ccsa.org](mailto:KDellAquila@ccsa.org)>  
**Subject:** <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter  
**Importance:** High

Hi everyone,

Thanks for your time and engagement at yesterday's LAAC meeting. We are excited to move our LAAC-approved policy priorities forward this year, including updated local charter renewal criteria and a student-focused performance framework.

**Response/Approval Requested by 7pm Today**

Since we met yesterday, our team incorporated the feedback you provided about our collective renewal letter and made corresponding updates which we have initially vetted by our chair and co-chair. **We request that each of you review the attached updated collective letter and respond directly via email to Keith (cc'd here) and me with feedback or suggested edits by end of day today. We will work to synthesize overall feedback and nail down a final draft with Emilio and Cristina today.**

Our goal is to secure the support of the entire LAAC before we distribute this letter the broader charter community tomorrow. **We hope to collect signatures of 75% of the charter community by Monday, September 24 to send to the Board on Tuesday prior to the Board Meeting on September 25.**

We are happy to jump on the phone today with folks if that is easier than providing written feedback.

Cassy

Cassy Horton  
Managing Director, Regional Advocacy, Greater Los Angeles  
California Charter Schools Association  
Cell: 213-926-7763  
Email: [chorton@ccsa.org](mailto:chorton@ccsa.org)  
Website: [www.ccsa.org](http://www.ccsa.org)

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Exhibit CC

**Subject:** Los Angeles Advocacy Council: April Meeting Phone Call  
**Location:** (213) 306-5943 (NO PIN)

**Start:** Friday, April 12, 2019 3:15 PM PDT  
**End:** Friday, April 12, 2019 4:15 PM PDT  
**Show Time As:** Busy

**Recurrence:** None

**Meeting Status:** Not yet responded

**Required Attendees:** bbauer <bbauer@ghchs.com>; erin.studer@chimeinstitute.org <erin.studer@chimeinstitute.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; Valerie Braimah <vbraimah@citycharterschools.org>; maaron@kippla.org <maaron@kippla.org>; osicat@ednovate.org <osicat@ednovate.org>; pimagee@palihigh.org <pimagee@palihigh.org>; P Hudnut <phudnut@icefps.org>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; ykingberg@ypics.org <ykingberg@ypics.org>; Carrie Wagner <cwagner@galsla.org>; agoldring@laleadership.org <agoldring@laleadership.org>; NHCA <rthomas@nhcharteracademy.com>; nbarriga@resoluteacademy.org <nbarriga@resoluteacademy.org>; Johnathan Williams <jwilliams@accelerated.org>; mkleger-heine@cwcclosangeles.org <mkleger-heine@cwcclosangeles.org>; Cassy Horton <chorton@ccsa.org>; Keith Dell'Aquila <KDellAquila@ccsa.org>; Chris Copolillo <ccopolillo@ccsa.org>; Jason Rudolph <jrudolph@ccsa.org>

As mentioned earlier, the reason for this move is due to the many scheduling conflicts you all surfaced that are occurring this month. Given the amount of urgent priorities happening right now, we felt it is important that we still connect this month versus cancelling our meeting completely. Again, thank you for your flexibility.

Agenda: Will be uploaded early next week

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Exhibit DD



**Subject:** RE: Fwd: CPRA request (TAS.2019.04.06.a)

**From:** Vincent Shih <vshih@accelerated.org>

**Date:** 8/5/19, 6:47 AM

**To:** "adrian@123mail.org" <adrian@123mail.org>, Robert French <rfrench@accelerated.org>

**CC:** "ericj@victory-group.com" <ericj@victory-group.com>, Board Members <board@accelerated.org>, Mia Watson <mwatson@accelerated.org>

Good morning,

Your request is currently in production and being reviewed. It will be sent to you shortly.

Thank you.

-----Original Message-----

From: [adrian@123mail.org](mailto:adrian@123mail.org) <[adrian@123mail.org](mailto:adrian@123mail.org)>

Sent: Saturday, August 3, 2019 10:20 AM

To: Vincent Shih <[vshih@accelerated.org](mailto:vshih@accelerated.org)>; Robert French <[rfrench@accelerated.org](mailto:rfrench@accelerated.org)>

Cc: [ericj@victory-group.com](mailto:ericj@victory-group.com); Board Members <[board@accelerated.org](mailto:board@accelerated.org)>; Mia Watson <[mwatson@accelerated.org](mailto:mwatson@accelerated.org)>

Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

Good morning, TAS.

I'm just wondering what's up with this matter. Please don't continue to ignore it.

Thanks,

Adrian

On Mon, Jul 8, 2019, at 7:01 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

As it happens, I do have a question. A response to this request was due more than three months ago by law, and yet, even now, you all have failed to respond to it adequately. The question is, of course, when may I expect a legally sufficient response?

Thanks again for your help!

Adrian

On Mon, Jul 8, 2019, at 6:59 PM, Vincent Shih wrote:

Dear Requestor:

Thank you for your patience in this matter. The District sent you its response to your March 18 and March 24 PRA requests. We are still in the process of locating the documents that you requested. If there are responsive, non-exempt documents, you should expect that production shortly.

Please feel free to contact me with any questions that you may have.

Vincent Shih

**\*Accounting Manager\***

The Accelerated Schools

<<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.accelerated.org%2F&data=01%7C01%7Cvshih%40accelerated.org%7C7065d5275c8b4ec83e8008d71836d61b%7Ce2f697b976974041994605fe2d93acc4%7C1&sdata=nsQwvAKEg7BgZMQc7b9DY6a2bI%2FTyfxJLz28TUqBTgo%3D&reserved=0>>

Phone: (323) 235-6343 ext. 2634

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

-----Original Message-----

From: [adrian@123mail.org](mailto:adrian@123mail.org) <[adrian@123mail.org](mailto:adrian@123mail.org)>  
Sent: Monday, July 8, 2019 9:09 AM  
To: Robert French <[rffrench@accelerated.org](mailto:rffrench@accelerated.org)>  
Cc: Vincent Shih <[vslih@accelerated.org](mailto:vslih@accelerated.org)>; [ericj@victory-group.com](mailto:ericj@victory-group.com);  
Board Members <[board@accelerated.org](mailto:board@accelerated.org)>; David Borovay  
<[dborovay@accelerated.org](mailto:dborovay@accelerated.org)>; Mia Watson <[mwatson@accelerated.org](mailto:mwatson@accelerated.org)>;  
[sslovac@calstatela.edu](mailto:sslovac@calstatela.edu)  
Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

On Sun, Jun 30, 2019, at 12:29 PM, [adrian@123mail.org](mailto:adrian@123mail.org) wrote:

----- Original message -----

From: [adrian@123mail.org](mailto:adrian@123mail.org)

To: Johnathan Williams [jlwilliams@accelerated.org](mailto:jlwilliams@accelerated.org), Asha Marshall  
[amarshall@accelerated.org](mailto:amarshall@accelerated.org)

Subject: CPRA request (TAS.2019.04.06.a)

Date: Saturday, April 06, 2019 7:51 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails related to TAS

business possessed by J. Williams in any account from January 1,  
2018

through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any  
email

address.

Please note that I need to see copies of the emails in native format

as required by the CPRA at Section 6253.9(a)(1). Native formats for

emails are MBOX, EML, or MSG. I also need to see all attachments to

these emails in their native formats. Please note that when you

provide emails in native format their attachments are automatically

included in native format.

If you find it necessary to redact any of the emails, please note that

both EML and MBOX are text formats. The files can be opened in any

text editor, e.g. Notepad, and segregable exempt material can be

redacted by replacing it with innocuous symbols, e.g.

+++++. Any other method of redaction destroys the

essential character, i.e. the searchability and sortability, of the

record and violates the CPRA at section 6253.9(a)(1). This method of

redaction is probably easier for you as well since it allows for

search and replace.

Finally, if you choose to withhold or redact any records responsive to

this request, please take measures as you would under a standard

litigation hold not to delete those records until we have settled any

disputes over claimed exemptions to our mutual satisfaction. If there

are any records which would be responsive but for the fact that you've

chosen not to consider them to be public records for any reason,

please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of

concurrent review and comment are hereby reserved. Thank you.

Attachments:

- \* CPRA Request\_3.18.19.pdf
- \* CPRA Request\_3.24.19.pdf

---

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

**Adrian Riskin vs. The Accelerated Schools [ 19STCP05135 ]**

STATE OF CALIFORNIA COUNTY OF LOS ANGELES

I am employed in the aforesaid county; I am over the age of eighteen years and not a party to the within entitled action; my business address is: 132 Westlake Avenue, Los Angeles, California 90026.

On March 8, 2021, I served the foregoing document(s) described as: **Petitioner's Reply Brief; Declaration of Adrian Riskin** on the interested parties in said action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as set forth below to:

Jeffrey L. Anderson  
Young, Minney & Corr, LLP  
655 University Ave, Suite 150  
Sacramento, CA 95825  
janderson@mycharterlaw.com

Attorney for Respondent,  
The Accelerated Schools

---

☐ **[ VIA MAIL ]** by depositing said envelope with postage thereon fully prepaid in the United States mail at Los Angeles, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

---

☐ **[ BY PERSONAL SERVICE ]** I caused the above referenced document(s) to be delivered to the addressee(s) set forth on the attached Service List.

---

☒ **[ VIA ELECTRONIC MAIL ]** I caused the above-referenced document(s) to be transmitted to the named person(s) to the electronic address(es) set forth on attached Service List.

---

☒ **[ STATE ]** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

---

Executed on March 8, 2021, at Los Angeles, California.



ROBERT D SKEELS, ESQ.